COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
Valley Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

American Safety Razor, Inc.
1 Razor Blade Lane
Verona, Virginia
Permit No. VRO80189

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Article 1, American Safety Razor has applied for a renewal of the Title V Operating Permit for its razor blade manufacturing facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Engineer/Permit Contact:_____ Date:_____

Air Permit Manager:_____ Date:_____

Regional Permit Manager:_____ Date:_____

FACILITY INFORMATION

Permittee
American Safety Razor, Inc.
1 Razor Blade Lane
Verona, Virginia 24482

Facility
American Safety Razor, Inc.
1 Razor Blade Lane
Verona, Virginia 24482

Plant Identification Number: 51-015-0016

SOURCE DESCRIPTION

SIC 3421 - Cutlery

American Safety Razor, Inc. is involved in the manufacturing, assembly, packaging, and warehousing of personal and industrial razor blade products.

The facility is a Title V major source of volatile organic compounds (VOCs) and trichloroethylene (TCE). This source is located in an attainment area for all pollutants, and is a PSD synthetic minor source. The facility was previously permitted under a State Operating Permit issued on August 22, 2001, which was superceded by a permit dated December 15, 2004. An existing Title V permit was issued on December 15, 1999 and expires on December 15, 2004.

COMPLIANCE STATUS

The facility is inspected once a year.

The facility was last inspected on June 16, 2004, and was determined to be out of compliance with the Title V permit dated December 14, 1999 and the State Operating Permit (SOP) dated August 22, 2001. The apparent violation was based on the installation of the 26th grinder without notification. American Safety Razor (ASR) submitted a Form 7 application form dated September 28, 2004 which provided information and PTE calculations for Grinder #26. The new grinder was evaluated and determined to be exempt from new source review permitting. The new grinder was added to the SOP under the source category GRIND for a total of 26 grinders. The PM and PM-10 emission limits remain the same.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units at this facility consist of the following:

Table I. Significant Emission Units

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Fuel Burning Equipment							
BL1	B1	Keeler Boiler #13106 (Constructed prior to 1972)	19.6 mmBTU/hr	-	-	-	12/15/04
BL2	B2	Keeler Boiler #14335 (Constructed prior to 1972)	13.1 mmBTU/hr	-	-	-	12/15/04
Razor Blade Production Operations							
WB2	CAUS	TCE Cold Inline Degreasing Unit (Manufactured 1994)	30 feet/minute	Detrex Carbon Adsorption Unit	CAU	TCE VOC	12/15/04
WB4	CAUS	TCE Cold Inline Degreasing Unit (Manufactured 1989)	119,000 blades/hr	Detrex Carbon Adsorption Unit	CAU	TCE VOC	12/15/04
WB5	CAUS	TCE Cold Inline Degreasing Unit (Manufactured 1989)	119,000 blades/hr	Detrex Carbon Adsorption Unit	CAU	TCE VOC	12/15/04
WB6	CAUS	TCE Cold Inline Degreasing Unit (Manufactured 1979)	119,000 blades/hr	Detrex Carbon Adsorption Unit	CAU	TCE VOC	12/15/04
WB8	CAUS	TCE Cold Inline Degreasing Unit (Manufactured 1977)	20,000 blades/hr	Detrex Carbon Adsorption Unit	CAU	TCE VOC	12/15/04
WB9	CAUS	TCE Cold Inline Degreasing Unit (Manufactured 1979)	20,000 blades/hr	Detrex Carbon Adsorption Unit	CAU	TCE VOC	12/15/04
WB10	CAUS	TCE Cold Inline Degreasing Unit (Manufactured 1972)	16,000 blades/hr	Detrex Carbon Adsorption Unit	CAU	TCE VOC	12/15/04
WB11	CAUS	TCE Cold Inline Degreasing Unit (Manufactured 1972)	26,000 blades/hr	Detrex Carbon Adsorption Unit	CAU	TCE VOC	12/15/04
WB12	CAUS	TCE Cold Inline Degreasing Unit (Manufactured 1972)	60 feet/minute	Detrex Carbon Adsorption Unit	CAU	TCE VOC	12/15/04

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
WB13	CAUS	TCE Cold Inline Degreasing Unit (Manufactured 1972)	26,000 blades/hr	Detrex Carbon Adsorption Unit	CAU	TCE VOC	12/15/04
WB14	CAUS	TCE Cold Inline Degreasing Unit (Manufactured 1972)	24,000 blades/hr	Detrex Carbon Adsorption Unit	CAU	TCE VOC	12/15/04
WB15	CAUS	TCE Cold Inline Degreasing Unit (Manufactured 1972)	36,000 blades/hr	Detrex Carbon Adsorption Unit	CAU	TCE VOC	12/15/04
WB16	CAUS	TCE Cold Inline Degreasing Unit (Manufactured 1984)	5,000 blades/hr	Detrex Carbon Adsorption Unit	CAU	TCE VOC	12/15/04
WB17	CAUS	TCE Cold Inline Degreasing Unit (Manufactured 1972)	20,000 blades/hr	Detrex Carbon Adsorption Unit	CAU	TCE VOC	12/15/04
WB18	CAUS	TCE Cold Inline Degreasing Unit (Manufactured 1972)	15,000 blades/hr	Detrex Carbon Adsorption Unit	CAU	TCE VOC	12/15/04
WB19	CAUS	TCE Cold Inline Degreasing Unit (Manufactured 1972)	14,000 blades/hr	Detrex Carbon Adsorption Unit	CAU	TCE VOC	12/15/04
WB20	CAUS	TCE Cold Inline Degreasing Unit (Manufactured 1972)	24,000 blades/hr	Detrex Carbon Adsorption Unit	CAU	TCE VOC	12/15/04
WB21	CAUS	TCE Cold Inline Degreasing Unit (Manufactured 1978)	28,000 blades/hr	Detrex Carbon Adsorption Unit	CAU	TCE VOC	12/15/04
WB22	CAUS	TCE Cold Inline Degreasing Unit (Manufactured 1978)	28,000 blades/hr	Detrex Carbon Adsorption Unit	CAU	TCE VOC	12/15/04
WB23	CAUS	TCE Cold Inline Degreasing Unit (Manufactured 1982)	28,000 blades/hr	Detrex Carbon Adsorption Unit	CAU	TCE VOC	12/15/04
WB24	CAUS	TCE Cold Inline Degreasing Unit (Manufactured 1984)	28,000 blades/hr	Detrex Carbon Adsorption Unit	CAU	TCE VOC	12/15/04
WB25	CAUS	TCE Cold Inline Degreasing Unit (Manufactured 1992)	28,000 blades/hr	Detrex Carbon Adsorption Unit	CAU	TCE VOC	12/15/04
BB1	CAUS	TCE Inline Vapor Degreasing Unit (Manufactured 1972)	11 feet/minute	Detrex Carbon Adsorption Unit	CAU	TCE VOC	12/15/04
GRIND	A-W	Razor Blade Grinding (Grinders 1-26)	-	Electrostatic and media filter oil mist eliminators	CD1 – CD25	PM PM-10	12/15/04

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
STL3 & STL4	CAUS	TCE Distillation Units	200 gallon/hr (each)	Detrex Carbon Adsorption Unit	CAU	TCE VOC	12/15/04
HT1-12	-	Heat Treat Pre-Stage Washers (Installed before 1992)	-	-	-	-	12/15/04
COAT1 & COAT2	-	Blade Coating Booths (Installed 1984 & 1995)	1400 blades/hr	-	-	-	12/15/04
INJ1-9	-	Injection Molding Machines	-	-	-	-	12/15/04

A copy of the 2003 annual emission update is attached as Attachment A. Emissions are summarized in the following tables.

Table II. 2003 Actual Criteria Pollutant Emissions

	Criteria Pollutant Emissions (tons/yr)				
	VOC	CO	SO_2	PM-10	NO_x
Boilers	0.04	0.46	0.23	0.08	1.81
Razor Blade Production Operations	99.00	-	-	4.00	-
Total	**99.04**	**0.46**	**0.23**	**4.08**	**1.81**

Table III. 2003 Actual Hazardous Air Pollutant Emissions

Pollutant	Hazardous Air Pollutant Emissions (tons/yr)
Trichloroethylene (TCE)	56.00[1]

[1]Note: This number is an estimate. TCE emissions are reported as VOC and as a result exact TCE emission rates are not known.

CHANGES SINCE INITIAL PERMIT

Changes from the initial Title V permit are:

- Addition of applicable requirements from 40 CFR Part 63 Subpart T, National Emission Standards for Halogenated Solvent Cleaning
- Deletion of trichloroethylene (TCE) limitation since Halogenated Solvent Cleaning MACT, Subpart T, applies
- Deletion of two trichloroethylene distillation units (STL1 and STL2) from the emission units
- Addition of Grinder # 26 to the equipment source GRIND for a total of 26 grinders
- Update of General Conditions with current boilerplate language

These changes are discussed in more detail below.

EMISSION UNIT APPLICABLE REQUIREMENTS

Fuel Burning Equipment Requirements - Units # BL1 & BL2

Limitations

The following limitations are requirements from the State Operating Permit issued on December 15, 2004. Please note that the condition numbers are from the 2004 permit; a copy of the permit is enclosed as Attachment B.

Condition 3: Limit on the types of fuels to be combusted in the boilers. Natural gas and distillate oil are the only approved fuels.

Condition 4: Emission limits for criteria pollutants.

Condition 5: Visible emission limit of 20%, except during one six-minute period in any hour where visible emissions shall not exceed 60%.

Condition 6: Limit on the sulfur content of distillate oil to be combusted. Sulfur content shall not exceed 0.5% by weight, per shipment.

Condition 7: Boiler emissions shall be controlled by proper operation and maintenance. Written operating procedures and a maintenance schedule will be maintained.

Monitoring and Recordkeeping

ASR does not meet the criteria for 40 CFR Part 64 Compliance Assurance Monitoring (CAM) applicability (40 CFR §64.2(a)(3)) because the pre-control PTE for all criteria pollutants for the boilers are under the Title V major threshold of 100 tons per year. The pre-control PTE for all criteria pollutants is the same as the emission limits established in Condition 4 of the State Operating Permit, dated December 15, 2004. The boilers are subject to the periodic monitoring requirements in 40 CFR Part 70 (Title V).

The monitoring and recordkeeping requirements in Conditions 6 and 8 of the State Operating Permit, dated December 15, 2004, have been modified to meet Part 70 requirements.

The permittee will monitor the sulfur content of each shipment of distillate oil, and will maintain certifications from each fuel supplier that demonstrates compliance with the 0.5%, by weight, requirement.

The permittee will keep records of the annual throughput of each type of fuel.

Actual emissions from the operation of the two boilers will be calculated using the following equations:

1. For natural gas combustion:

$E = F \times N$

..... Equation 1

Where:

E = Emission Rate (lb/time period)

F = Pollutant specific emission factors as follows:

TSP	=	6.2 lb/million ft^3
PM-10	=	6.2 lb/million ft^3
SO_2	=	0.6 lb/million ft^3
CO	=	35.0 lb/million ft^3
NO_x	=	140.0 lb/million ft^3
VOC	=	2.8 lb/million ft^3

N = Natural gas consumed (million ft^3/time period)

2. For distillate oil combustion:

$E = F \times O$

..... Equation 2

Where:

E = Emission Rate (lb/time period)

F = Pollutant specific emission factors as follows:

TSP	=	2.0 lb/1000 gal
PM-10	=	1.0 lb/1000 gal
SO_2	=	143.6 S lb/1000 gal (S = weight percent sulfur)
CO	=	5.0 lb/1000 gal
NO_x	=	20.0 lb/1000 gal
VOC	=	0.2 lb/1000 gal

O = Distillate oil consumed (1000 gal/time period)

The hourly emission limits established for all criteria pollutants (particulate, SO_2, NO_x, CO, and VOC) are based on the capacity of the boilers. Therefore, if the boilers are operated at capacity, or below, there should not be a violation of the hourly emission rates. Calculations have been included in Attachment C to demonstrate how the limits were obtained.

The annual emission limits established for all criteria pollutants (particulate, SO_2, NO_x, CO, and VOC) are based on 8760 hours of operation. Regarding these pollutants, the fuel throughput is the factor that determines emission rates. Calculations have been included in Attachment C to demonstrate that if ASR runs both boilers at full capacity for 8760 hours per year, then the permit limits will not be violated. Therefore, there is very little chance that the criteria pollutant emission limits will be violated. Recordkeeping demonstrating the total amount of each fuel combusted each year can be used to demonstrate compliance with the criteria pollutant emission limits, satisfying the periodic monitoring requirement.

During recent inspections of the boilers, no opacity violations have been noted. Based on the types of fuel to be combusted in the boilers, and the compliance history, there is little likelihood of violating the opacity limitation. Therefore, as long as the boilers are operated properly, it can be assumed that the opacity limitation will not be violated. Maintenance of operating procedures and performance of maintenance in accordance with the maintenance schedule will ensure compliance with the opacity limitation and satisfy the periodic monitoring requirement.

Testing

The permit does not require source tests. A table of test methods has been included in the permit if testing is performed. The Department of Environmental Quality (DEQ) and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting

No specific reporting has been included in the permit for the boilers.

Streamlined Requirements

There were no streamlined requirements for the boilers.

Razor Blade Production Operations

Limitations

ASR is subject to the National Emission Standards for Halogenated Solvent Cleaning MACT, 40 CFR Part 63 Subpart T which establishes emission standards for halogenated solvent cleaning machines such as the washboxes operated by ASR. The washboxes employ trichloroethylene to clean the razor blades during production. The units clean the razor blades at speeds of greater than 11 feet per minute. Therefore, the washboxes are considered continuous web cleaning machines (per the definition given in 40 CFR 63.461). ASR has decided to comply

with the alternative standard established in 40 CFR 63.464(d) which requires an overall cleaning system control efficiency of 70 percent or greater. This standard has been included in the permit as Condition IV.A.2.

Additionally, the following limitations (requirements from the State Operating Permit issued on December 15, 2004) have also been included in the permit. Please note that the condition numbers are from the 2004 permit; a copy of the permit is enclosed as Attachment B.

Condition 9: Requirement to control VOC and TCE emissions by operating a carbon adsorption unit.

Condition 10: Emission limits for criteria pollutants.

Condition 11: Visible emission limit of 20%.

The reference to Stacks S1 and S2 have been removed from Condition IV.A.4. because the distillation units and the corresponding stacks have been taken out of service.

The trichloroethylene (TCE) limitation has been removed from the State Operating Permit and the Title V Federal Operating Permit. As discussed above, ASR is subject to the Halogenated Solvent Cleaning MACT, Subpart T. In May 2002, the air toxic regulations (Rule 6-4 and 6-5) were modified and it is no longer necessary to regulate toxics separately if the permitted equipment is subject to MACT requirements.

Monitoring and Recordkeeping

As per 40 CFR Part 64 Compliance Assurance Monitoring (CAM), emission limitations or standards proposed after November 15, 1990 pursuant to section 111 or 112 are exempt from CAM (40 CFR §64.2(b)(1)). All applicable monitoring requirements from Subpart T have been included in the permit. Since Subpart T was promulgated on December 2, 1994 under the authority of Section 112 National Emission Standards for Hazardous Air Pollutants (NESHAP), this standard is exempt from CAM requirements, and no additional monitoring has been incorporated into the Title V permit.

The monitoring and recordkeeping requirements of Condition 12 of the State Operating permit have been modified to meet Part 70 requirements.

Demonstration of the overall system control efficiency, using a mass balance of the trichloroethylene through the entire cleaning system, was added to the permit. This requirement is established in 40 CFR 63.465(g) and (h) and in the applicability determination from EPA dated March 1, 2001 (Attachment D).

The permit includes requirements for maintaining records of all monitoring and testing required by the permit. These records include:

- monthly and annual throughput and emissions of VOCs
- monthly and annual throughput and emissions of TCE
- monthly and annual emissions of particulates
- log of weekly visible inspections
- log of weekly outlet trichloroethylene concentration tests
- dates and amounts of solvent added
- dates and amounts of solvent recovered from carbon adsorber
- solvent composition of wastes removed
- calculation sheets showing the overall cleaning system control efficiency

The primary emission source of particulates is the grinders. The hourly emission rates established for particulates are based on capacity of the grinders. Therefore, if the grinders are operated at capacity, or below, there should not be a violation of the hourly emission rates.

The annual emission rates (PM, PM-10, and VOC) are based on the maximum capacity of all units, and assume operation for 8760 hours per year. Therefore, if the equipment is operated at capacity, or below, there should not be a violation of the annual emission rates. American Safety Razor is required to maintain records to demonstrate that the annual emission rates are not violated. Calculations have been included in Attachment C to demonstrate how the limits were obtained. In the case of VOC and TCE emissions, records regarding throughput of solvents are also required. The required recordkeeping will satisfy the periodic monitoring requirement for the emission limitations.

The permit contains a requirement for ASR to measure and record the outlet concentration of TCE from the carbon adsorber on a weekly basis. This will ensure that the control device is operating properly and maintaining a control efficiency of 95-98%. The weekly testing will also reinforce the recordkeeping used to demonstrate compliance with the VOC emission limit. This satisfies the periodic monitoring requirement for the carbon adsorption unit.

The permit contains a requirement for ASR to operate filterboxes or oil mist collectors on each grinder stack. A filterbox is a hollow metal box that contains a metal mesh filter. The exhaust gas from the grinder is passed through the box where the oil mist (primary source of particulate emissions) condenses on the mesh filter. Assuming that the filterboxes and oil mist collectors are working properly, there should be no particulate emissions and, therefore, no visible emission present.

The permit also contains a requirement for ASR to perform weekly inspections on each grinder stack. If visible emissions are present, a six minute visible emission evaluation must be performed unless the corrective action can be taken such that the stack is returned to no visible emissions. If during the six minutes any violations of the 20% opacity standard are noted, a one hour visible emission evaluation is required to demonstrate compliance with the standard. If 12

weekly inspections are performed on any given stack, and no visible emissions are present, then the visible inspections may be performed monthly. However, as soon as visible emissions are noted during a monthly inspection, the inspections must then be performed weekly again.

All other stacks associated with the razor blade production operations emit only VOC. Due to the fact that no particulate emissions are expected, no visible emissions are expected. Therefore, there is little likelihood that the visible emission standard will ever be violated. No periodic monitoring is required for stacks that will only emit VOC.

The requirement for visible emission inspections of each grinder stack satisfies the periodic monitoring requirement for visible emissions from the razor blade production operations.

Testing

The requirement for ASR to calculate their potential to emit (PTE) from all solvent cleaning operations as outlined in 40 CFR 63.465(e) was not included in the permit. The PTE calculation is now irrelevant for the facility because it has already been determined that ASR is a major source and the requirement has been satisfied. The permit does not require source tests. A table of test methods has been included in the permit if testing is performed. The DEQ and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting

The permit requires ASR to submit annual solvent emission reports and exceedance reports for the halogenated solvent cleaning machines.

The requirement for an initial notification and an initial statement of compliance was not included in the permit because ASR provided these notifications to EPA on October 23, 1996 and April 30, 1998.

Streamlined Requirements

Condition 11 (TCE emission limit) of the State Operating Permit was deleted since the source is subject to the Halogenated Solvent Cleaning MACT, 40 CFR Part 63 Subpart T.

GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110, that apply to all Federal operating permit sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also

requires notification of deviations from permit requirements or any excess emissions, including those caused by upsets, within one business day.

The general conditions were updated with current boilerplate language, which resulted in changes or additions to the following:

- Permit Expiration
- Recordkeeping and Reporting
- Annual Compliance Certification
- Permit Deviation Reporting
- Failure/Malfunction Reporting
- Permit Modification (previously Permit Action for Cause)
- Duty to Pay Permit Fees
- Malfunction as an Affirmative Defense
- Permit Revocation or Termination for Cause
- Asbestos Requirements

STATE ONLY APPLICABLE REQUIREMENTS

American Safety Razor did not identify any state-only enforceable requirements in their application, and all requirements in the state operating permit are federally enforceable. Therefore, no state-only applicable requirements have been included in the permit.

FUTURE APPLICABLE REQUIREMENTS

American Safety Razor did not identify any future applicable requirements in their application, and DEQ staff is unaware of any requirements that they could become subject to during the life of the Title V permit. Therefore, no future applicable requirements have been included in the permit.

INAPPLICABLE REQUIREMENTS

American Safety Razor requested to have 9 VAC 5 Chapter 80, Article 8 (PSD) listed as an inapplicable requirement. The staff's decision is that it is not possible to list PSD as an inapplicable requirement for any facility.

EPA policy states that noncompliance arising from previous applicability determinations is subject to enforcement and is not covered by the Part 70 permit shield. Also, PSD determinations require an evaluation of past actual emissions to future potential emissions to determine if certain changes are subject to PSD permitting. Sources cannot use the Title V permit to shield themselves from this review.

Due to the above stated reasons, PSD was not included as an inapplicable requirement in the Title V permit.

COMPLIANCE PLAN

Since ASR submitted a Form 7 application to correct the Grinder #26 issue, they will be in compliance with all applicable requirements once the amended SOP is issued. No compliance plan was included in the application or in the permit.

INSIGNIFICANT EMISSION UNITS

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

The injection molding machines (Unit # INJ) were included in the application as insignificant activities. The VOC and PM-10 emissions from the injection molding machines are included in the emission limits for razor blade production operations. Therefore, the injection molding machines are included as significant activities in the Title V permit.

Insignificant emission units include the following:

Table IV. Insignificant Emission Units

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
FP1	Grinnell Fire Pump (diesel)	9 VAC 5-80-720 C	-	290 HP
EMG	Emergency Generator (natural gas)	9 VAC 5-80-720 C	-	150 KVA
EMGL	Emergency Generator (natural gas)	9 VAC 5-80-720 C	-	66 KVA
BTU1 & BTU2	Sintering BTU Furnaces (electric)	9 VAC 5-80-720 B	PM PM-10	-
TCE-D, TCE-R, TCE-V	TCE Storage Tanks	9 VAC 5-80-720 B	TCE VOC	-
03D1, 03D2, 03D3	Process Tanks	9 VAC 5-80-720 B	VOC	-
FPUMP, #2 FUEL	#2 Fuel Oil Storage Tanks	9 VAC 5-80-720 B	VOC	-
GAS	Gasoline Storage Tank	9 VAC 5-80-720 B	VOC	-
VAR-W, VAR-V	Mineral Spirits Storage Tanks	9 VAC 5-80-720 B	VOC	-

TCE-R, TCE-R2, TCE-GRV1, TCE-GRV2	TCE Return Process Tanks	9 VAC 5-80-720 B	TCE VOC	-
API/STRP	API Oil Water Separator and Air Stripper for Water from Remediation Wells and No. 2 Lagoon	9 VAC 5-80-720 B	TCE VOC	-
HTF	Twelve (16) Electric Heat Treating Furnaces	9 VAC 5-80-720 B	VOC	-
PC	Four (4) Parts Cleaners (petroleum solvent)	9 VAC 5-80-720 B	VOC	-
DEP	Double Edge Printer	9 VAC 5-80-720 B	VOC	-
ROTG	Eight (8) Rotary Grind Machines	9 VAC 5-80-720 B	PM PM-10	-
Pp	Perforating Presses	9 VAC 5-80-720 B	VOC	-
RI	Rust Inhibitor – Kerosene based	9 VAC 5-80-720 B	VOC Glycol Ether	-

[1]The citation criteria for insignificant activities are as follows:
9 VAC 5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application
9 VAC 5-80-720 B - Insignificant due to emission levels
9 VAC 5-80-720 C - Insignificant due to size or production rate

CONFIDENTIAL INFORMATION

American Safety Razor did not submit a request for confidentiality. Therefore, all portions of the Title V application are suitable for public review.

PUBLIC PARTICIPATION

A public notice regarding the draft permit was placed in the *Daily News Leader*, Staunton, Virginia, on November 10, 2004. EPA was sent a copy of the draft permit and notified of the public notice on November 9, 2004. West Virginia, the only affected state, was sent a copy of the public notice in a letter dated November 10, 2004. All persons on the Title V mailing list were also sent a copy of the public notice in letters dated November 10, 2004. EPA's 45-day review period ended on December 24, 2004.

No comments were received.

ATTACHMENTS

A. 2003 Emission Inventory
B. State Operating Permit issued December 15, 2004
C. Emissions Calculations
D. EPA Applicability Determination Letter

ATTACHMENT A

2003 Emission Inventory

ATTACHMENT B

State Operating Permit
(dated December 15, 2004)

ATTACHMENT C

Emissions Calculations

ATTACHMENT D

EPA Applicability Determination Letter